

**IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN  
DISTRICT OF TENNESSEE  
SOUTHERN DIVISION**

**MARY A. SMITH**

*Plaintiff,*

vs.

**WRIGLEY MANUFACTURING  
COMPANY, LLC**

*Defendant.*

CIVIL ACTION NO: \_\_\_\_\_

**JURY DEMAND**

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**COMPLAINT**

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Mary A. Smith, Plaintiff, would show the Court the following as her Complaint against the Defendant, Wrigley Manufacturing Company, LLC:

**I.**

Defendant is a limited liability company organized in the State of Delaware and licensed to do business in the State of Tennessee. Defendant conducts a manufacturing plant in Hamilton County, Tennessee where Plaintiff was previously employed. Plaintiff is a resident of Hamilton County, Tennessee. The cause of action alleged herein arose in the Southern Division of the Eastern District of Tennessee. Defendant employs 20 or more employees, and conducts business in interstate commerce.

**II.**

Plaintiff was a longtime employee of Defendant and its predecessor company. Despite Plaintiff's good record with the Defendant, Defendant discharged the employment of Plaintiff on or about March 3, 2016. This discharge was largely based upon the pretext of alleged misconduct when the real motivation was age discrimination in violation of 29 U.S.C. § Sections 621 to 634. Plaintiff is and was over 40 years of age at the time of discharge.

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**III.**

Plaintiff timely filed a Complaint with the Equal Employment Opportunity Commission, who issued a Dismissal and Notice of Rights dated May 3, 2017, a copy of which is attached as Exhibit A, to this Complaint.

**IV.**

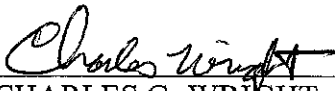
As a direct and proximate result of the discriminatory actions of the Defendant, Plaintiff has lost earnings and incurred attorney fees and costs. The actions of Defendant were willful and with an intent to hurt Plaintiff.

**V.**

**WHEREFORE**, Plaintiff prays:

- 1) That Defendant be served with a copy of this Complaint, process and be ordered to answer.
- 2) That Plaintiff be granted a judgment for lost earnings, attorney fees and costs.
- 3) That Plaintiff be reinstated in her prior employment.
- 4) That Plaintiff be granted punitive damages.
- 5) That Plaintiff be granted a jury trial.
- 6) That Plaintiff be granted general relief.

**RESPECTFULLY SUBMITTED**, this ~~23rd~~ day of June, 2017.

  
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